

Approach to the review of the Commonwealth's implementation of the Aged Care Royal Commission recommendations

Background to the review

The Royal Commission into Aged Care Quality and Safety (Aged Care Royal Commission) delivered its final report on 26 February 2021, making a comprehensive set of 148 recommendations to reform Australia's aged care system.

In May 2021 the Australian Government released its [response to the Aged Care Royal Commission](#). From 2021-2026 successive Australian Governments commenced and continued reforms based on the royal commission's recommendations.

Sections 28 and 29 of the *Inspector-General of Aged Care Act 2023* requires the Inspector-General of Aged Care (Inspector-General) to conduct 2 progress reports and 2 reviews of the Commonwealth's implementation of each recommendation.

The Inspector-General completed progress reports in [June 2024](#) and [June 2025](#). The central focus in the 2025 report, *Progress Report: Implementation of the Recommendations of the Royal Commission into Aged Care Quality and Safety 2025* (2025 Progress Report) was 'whether collective government reforms are delivering the transformational, whole-of-system change called for by the Royal Commission'.¹ The Inspector General found that, as at 1 January 2025, the government had made many worthwhile reforms but that it had not achieved transformative change.²

Since the 2025 Progress Report, the new *Aged Care Act 2024* has taken effect and there have been significant and ongoing reforms of the aged care sector.

This first mandated review by the Inspector-General will be completed on or before 1 November 2027. The second review must be completed on or before 1 March 2031.

Developing the approach to the review

In developing the approach to this review, the Office of the Inspector-General of Aged Care (the Office) worked with the Australian Centre for Evaluation (ACE) within the Department of the Treasury. The ACE provided analytical foundations and practical outputs to inform the Inspector-General's approach to this review.

¹ Inspector-General of Aged Care (2025). [2025 progress report on the implementation of the recommendations of the Royal Commission into Aged Care Quality and Safety](#), p. 6.

² Inspector-General of Aged Care (2025). [2025 progress report on the implementation of the recommendations of the Royal Commission into Aged Care Quality and Safety](#), p. 7.

Approach to the review

This review will carefully appraise whether the measures and actions taken by the Australian Government in implementing the Aged Care Royal Commission recommendations have met, or are likely to achieve, the intended outcomes of the royal commission.

To assist in answering this question, the review will take a 3-tiered approach, assessing:

1. the system as a whole
2. key strategic outcome areas of the Aged Care Royal Commission
3. the implementation of each royal commission recommendation.

1. System-wide questions

The review will consider how the aged care system has changed since the Aged Care Royal Commission, including exploring:

- improvements in the aged care system
- what has not improved or has deteriorated
- whether further action is required to achieve the intended outcomes of the Aged Care Royal Commission.

2. Key strategic outcome areas

The Office of the Inspector-General of Aged Care has identified 9 key strategic outcome areas that capture the intended outcomes of the Aged Care Royal Commission's recommendations (see **background paper** for more detail):

- People-centred aged care: a rights-based system
- Leadership and government accountability
- Access and navigation
- High quality and safe care and support
- An Aboriginal and Torres Strait Islander aged care pathway
- Equitable aged care
- Regulation and provider accountability
- Workforce
- Sustainable aged care.

The review will closely examine the measures and actions taken by the Australian Government in relation to these key strategic outcome areas. To assist in this task the review will consider:

- **Appropriateness:** How appropriate are the measures and actions taken or proposed?
- **Effectiveness:** How effective are the measures and actions taken or proposed?
- **Accountability:** Does the government's response allow for public accountability for achieving the intended outcomes of the royal commission?
- **Opportunities for improvement:** Whether further action is required to deliver the royal commission's intended outcomes?

The Inspector-General will consider the measures and actions taken in response to each of the 148 recommendations of the Aged Care Royal Commission. However, resources and effort will prioritise key areas of reform that are most likely to support or hinder the royal commission's intended outcomes across these 9 outcome areas.

3. Assessment of the implementation of the recommendations

The Inspector-General will assess the government's response to the royal commission's recommendations using the assessment framework outlined in this section. This is based on the framework used in the 2025 Progress Report, which assessed the 'government position' and 'delivery status' of each recommendation. The government will be asked to provide a response using this framework.

Inspector-General's framework for appraising implementation

1. Government position

In the 2025 Progress Report, the Inspector-General classified the government's position on a recommendation using the following 5 criteria:

- **'Accepted in full'**: The government has agreed to implement the recommendation, including all relevant sub-components, in full.
- **'Accepted in part'**: The government has agreed to implement some parts of the recommendation but with some sub-components rejected (either in full or in favour of an alternative approach) or under further consideration.
- **'Under further consideration'**: The government is still considering its position on the recommendation and its sub-components.
- **'Rejected in favour of an alternative approach'**: The government has decided not to proceed with implementing the recommendation and its sub-components as per the final report, and has instead decided on an alternative course of action which is fundamentally different from the recommendation.
- **'Rejected in full'**: The government has decided not to take any action to implement the recommendation or any of its sub-components.

A recommendation was classified as **'rejected'** where:

- the government chose an approach which did not align with that proposed by the royal commission
- no action had been taken because a decision was made not to implement a recommendation
- the government needed to choose between alternative recommendations presented by commissioners.

The review will not revisit the 2025 assessment of the government's position **unless**:

- the recommendation was assessed as 'Under further consideration' in 2025.
- an agency/government seeks a reassessment and provides new evidence to support a change in category (see 'Approach to evidence' below). The Inspector-General will only undertake a reassessment in exceptional circumstances and not to relitigate issues raised during the 2025 Progress Report process.

2. Delivery status

The review will seek an update from government entities against each recommendation assessed as 'accepted in full', 'accepted in part', 'under further consideration' or 'rejected in favour of an alternative approach'.

In providing this update, entities will be asked to identify the following, and provide evidence supporting their response:

- **Plan – what was intended and why?** Summarise scope, timelines, dependencies, governance and resourcing, how lived-experience and provider and other stakeholder input was incorporated, and how the work aligns to the recommendation's intent or, if it does not, what the intent of the work is.
- **Do – what has been delivered?** Describe actions taken and outputs relevant to the recommendation, with dates and coverage outlined
- **Check – what verifies that the change is operating as intended?** Provide proportionate verification through routine monitoring or evaluation
- **Act – what will happen next?** Show course-corrections, mitigations, or refinements made as issues emerged, including how lived experience and provider feedback informed adjustments.

Entities may elect to address multiple recommendations collectively in their delivery status update.

The entities' responses will be used to inform the Inspector-General's assessment of appropriateness, effectiveness, accountability and opportunities for improvement.

The responses may be published through the review process or in the final report.

Approach to evidence

In addition to asking entities to provide evidence to support their response to the 'delivery status' or their request for a change to the 'Government position', the Inspector-General may also request evidence in other contexts.

The Office will assess evidence for:

- **sufficiency** – is there enough of the right kind of evidence?
- **relevance** – is the evidence relevant?
- **credibility** – can the material be relied on?

The amount and detail of the evidence provided should be proportionate to the recommendation and intended outcomes. Broader reforms will generally require more detailed evidence than more targeted reforms.

Principles guiding the review

The review will be guided by the following principles:

- Evidence-based assessment
- Independence and objectivity
- Transparency
- Person-centred focus, prioritising the experiences of older people, their carers and advocates
- Commitment to provider perspective
- Proportionality and fairness
- Cultural safety for Aboriginal and Torres Strait Islander peoples
- Trauma-informed
- Inclusivity for diverse groups, including veterans, LGBTIQ+ communities, CALD communities, and people with disability.